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NAS PENSACOLA
5090.3a

LETTER REGARDING REGULATORY REVIEW WITH MINOR COMMENTS ON FINAL
REMEDIAL ACTION PLAN SHERMAN FIELD FORMER FUEL FARM UNDERGROUND
STORAGE TANK 24 NAS PENSACOLA FL

1/10/2003

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



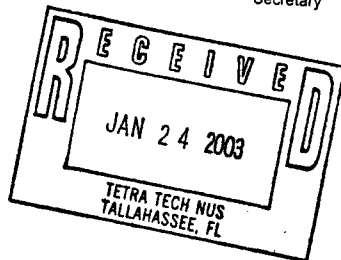
Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

January 10, 2003



Mr. Byas Glover
Code ES249
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
P.O. Box 190010
North Charleston, South Carolina 29419-9010

RE: Final Remedial Action Plan, Sherman Field Former Fuel
Farm Underground Storage Tank Site 000024, Pensacola,
Florida

Dear Mr. Glover:

I have completed the technical review of the above referenced document dated November 2002 (received November 26, 2002). Please see the minor comments from Greg Brown. Based upon my review and a review by Mr. Greg Brown, P.E., the enclosed Remedial Action Plan Approval Order was signed by Mr. Douglas A. Jones, Chief, Bureau of Waste Cleanup.

If I can be of any further assistance with this matter, please contact me at (850) 245-8998

Sincerely,

Tracie L. Vaught
Remedial Project Manager

cc: Greg Campbell, NAS Pensacola
Gerry Walker, Tetra Tech NUS, Tallahassee
Gregory Roof, Tetra Tech NUS, Tallahassee
Charlie Goddard, FDEP Northwest District

TJB

JJC

ESN



Department of Environmental Protection

Jeb Bush
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Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

January 22, 2003

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Mr. Byas Glover
Code ES249
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
Post Office Box 190010
North Charleston, South Carolina 29419-9010

Subject: Remedial Action Plan Approval Order
Sherman Fuel Farm
Naval Air Station Pensacola
Pensacola, Florida
Escambia County

Dear Mr. Glover:

The Bureau of Waste Cleanup has reviewed the Remedial Action Plan (RAP) dated November 2002 (received November 26, 2002) submitted for the petroleum product discharge discovered at this site. We found all the documents submitted to date to be adequate to meet the RAP requirements of Rule 62-770.700, Florida Administrative Code (F.A.C.). The Florida Department of Environmental Protection (Department) has determined that the actions proposed in this RAP constitute a reasonable strategy toward accomplishing the cleanup objectives of Chapter 62-770, F.A.C. Pursuant to Rule 62-770.700(8), F.A.C., the Department approves the RAP as described in this RAP Approval Order (Order). The operation of the active remediation system should be initiated within the time frame approved in SMP.

You are also required to submit to the Department record drawings (as-built drawings) of the treatment system within initiating operation of the active remediation system(s). These drawings must be certified by a professional engineer.

Legal Issues

The Department's Order shall become final unless a timely petition for an administrative proceeding (hearing) is filed under Sections 120.569 and 120.57, Florida Statutes (F.S.), within 21 days of receipt of this Order. The procedures for petitioning for a hearing are set forth below.

"More Protection, Less Process"

Persons affected by this Order have the following options:

If you choose to accept the above decision by the Department about the RAP you do not have to do anything. This Order is final and effective as of the date on the top of the first page of this Order.

If you disagree with the decision, you may do one of the following:

- (1) File a petition for administrative hearing with the Department's Office of General Counsel within 21 days of receipt of this Order; or
- (2) File a request for an extension of time to file a petition for hearing with the Department's Office of General Counsel within 21 days of receipt of this Order. Such a request should be made if you wish to meet with the Department in an attempt to informally resolve any disputes without first filing a petition for hearing.

Please be advised that mediation of this decision pursuant to Section 120.573, F.S., is not available.

How to Request an Extension of Time to File a Petition for Hearing

For good cause shown, pursuant to Rule 62-110.106(4), F.A.C., the Department may grant a request for an extension of time to file a petition for hearing. Such a request must be filed (received) in the Department's Office of General Counsel at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, within 21 days of receipt of this Order. Petitioner, if different from Southern Division of Naval Facilities Engineering Command, shall mail a copy of the request to Southern Division of Naval Facilities Engineering Command at the time of filing. Timely filing a request for an extension of time tolls the time period within which a petition for administrative hearing must be made.

How to File a Petition for Administrative Hearing

A person whose substantial interests are affected by this Order may petition for an administrative hearing under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, within 21 days of receipt of this Order. Petitioner, if different from Southern Division of Naval Facilities Engineering Command, shall mail a copy of the petition to Southern Division of Naval Facilities Engineering Command at the time of filing. Failure to file a petition within this time period shall waive the right of anyone who may request an administrative hearing under Sections 120.569 and 120.57, F.S.

Pursuant to Section 120.54(5)(b)4.a., F.S., and Rule 28-106.201, F.A.C., a petition for administrative hearing shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the name, address, and telephone number of the petitioner's representative, if any, the site owner's name and address, if different from the petitioner, the FDEP facility number, and the name and address of the facility;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) An explanation of how each petitioner's substantial interests are or will be affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, or a statement that there are no disputed facts;
- (e) A statement of the ultimate facts alleged, including a statement of the specific facts the petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the Department to take with respect to the Department's action or proposed action.

This Order is final and effective as of the date on the top of the first page of this Order. Timely filing a petition for administrative hearing postpones the date this Order takes effect until the Department issues either a final order pursuant to an administrative hearing or an order responding to supplemental information provided pursuant to meetings with the Department.

Judicial Review

Any party to this Order has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice of appeal must be filed within 30 days after this Order is filed with the clerk of the Department (see below).

Mr. Byas Glover
Page Four
January 22, 2003

Questions

Any questions regarding the Department's review of your RAP should be directed to Tracie L. Vaught at (850) 245-8998. Questions regarding legal issues should be referred to the Department's Office of General Counsel at (850) 245-2242. Contact with any of the above does not constitute a petition for administrative hearing or request for an extension of time to file a petition for administrative hearing.

Sincerely,

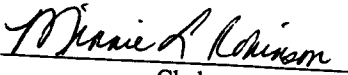


Douglas A. Jones, Chief
Bureau of Waste Cleanup
Division of Waste Management

DAJ/tlv

cc: File

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to
§120.52 Florida Statutes, with the
designated Department Clerk, receipt
of which is hereby acknowledged.



Clerk
(or Deputy Clerk)

1/22/03

Date

Memorandum

Florida Department of Environmental Protection

TO: Tracie Vaught, Remedial Project Manager,
Technical Review Section

THROUGH: Tim Bahr, P.G., Supervisor, Technical Review Section *TB*

FROM: Greg Brown, P.E., Professional Engineer II, Technical
Review Section

DATE: January 2, 2003

SUBJECT: Remedial Action Plan, Sherman Field Former Fuel Farm
UST, Site 24, NAS Pensacola, Florida

I reviewed the subject engineering document dated November 2002 (received November 26, 2002). Mr. Gregory S. Roof, P.E., Florida PE Number 0050842, is the engineer of record. It is a well conceived strategy for a source removal at Site 24, conceptually similar to Site UST 25. The design engineer estimates about 15 years to complete the source removal. The Navy should provide an addendum as soon as it is feasible to address residual soil and groundwater contamination once free product has been removed to the extent practicable. Additionally, the Navy should implement routine groundwater monitoring while source removal is in progress. My certification of approval is attached. I have the following minor comments for your consideration:

1. The mass estimate in Section 4.0 is about 1.6 times the original release volume reported in Section 1.3. This possible overestimation of the actual mass of contamination may indicate that the system has been designed with excess capacity. The contaminant mass estimate should be continually refined as data are collected so that the remedial system can be adjusted for efficiency.
2. The soil vapor concentrations could be particularly high during start-up of dual-phase extraction (bioslurping) and may make carbon absorption impractical. Adequate performance monitoring is necessary, and contingencies for alternative vapor treatment should be available if emissions are excessive.

Please call me at (850) 245-8993 if you have questions.



Department of Environmental Protection

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Tallahassee, Florida 32399-2400

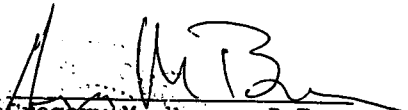
David B. Struhs
Secretary

January 2, 2003

CERTIFICATION OF APPROVAL

RE: Remedial Action Plan, Sherman Field Former Fuel Farm UST,
Site 24, NAS Pensacola, Florida

I hereby certify that in my professional judgment, the components of this remedial action plan satisfy the requirements set forth in Chapter 62-770, F.A.C., for source removal, and that the engineering design features incorporated in this plan provide reasonable assurances of achieving the objectives stated in Chapter 62-770, F.A.C., for remedial action. However, I have not evaluated and do not certify aspects of this plan that are outside the limits of my review responsibilities and outside my area of expertise (including but not limited to electrical, mechanical, and structural features). I personally completed this review.


Gregory M. Brown, P.E.
Professional Engineer No. 42194
Expires February 28, 2003

J.A.N. 2, 2003
Date

Attachment